

This is to oppose RM-10787, which proposes to eliminate the 5 wpm Morse code test for amateurs who wish to transmit on the "HF" frequency bands (30MHz and below). These frequencies are a precious resource and Morse code has proven, time and again, to be the only feasible frequency mode available 1) that can be useful during emergencies especially when band conditions are bad 2) for communications with other amateurs in poorer countries than the USA. Allowing access to these unique frequencies by individuals unfamiliar with Morse code would result in a structure wherein the Morse-only subbands would likely be modified to allow voice. In doing so, those individuals worldwide who wish to communicate via Morse would be deprived of usage of the common Morse frequencies and be forced to upgrade to mode that they may not be able to afford, would likely require higher power levels to communicate, especially on the 40m and 80m bands and result in either voice communications that are less reliable than CW or digital, which is more expensive and not generally available in some countries that use Morse extensively such as the Philippines, India, some parts of Russia, Africa and even in the case of expeditionary groups in such places as the Antarctic. Finally, the US still needs to have a stable population of individuals who can send and receive Morse code in times of communications emergencies and certain military situations. The current population of such individuals will suffer attrition rates and almost certainly cease to exist in the future without the current Morse code requirements for amateur operators. Usage of these frequencies is a great privilege and knowledge of Morse is a very small price to pay while our Nation benefits from having a pool of competent Morse operators. Thank you for the opportunity to comment on this proposal.

Respectfully Submitted,

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